

**Finance Letter Rulings Issued
on a Nondisclosure Basis**

Effective immediately, the New York City Department of Finance will issue letter rulings without requiring the taxpayer to be identified provided the ruling request otherwise meets the requirements of Title 19, Chapter 16 of the Rules of the City of New York Relating to Letter Rulings. Such rulings will be considered to be issued on hypothetical facts under section 16-01(d) of those rules. Among other things, those rules provide that a ruling will not be issued covering an issue or set of facts regarding which a statutory notice has been issued to the taxpayer. 19 RCNY §16-01(c)(1). Where the taxpayer is not identified in the ruling request, the Department will require the individual submitting the request to state in writing that to the best of that individual's knowledge and belief, no notice of determination or disallowance has been issued to any taxpayer covering the issues and facts presented.

The Department of Finance has issued this Finance Memorandum for the purpose of advising taxpayers and tax professionals of, and explaining the Department's current position and procedures with respect to, the issue addressed so that they may act accordingly. Finance Memoranda are advisory in nature and are merely explanatory. Finance Memoranda are not declaratory rulings or rules of the Department of Finance and do not have legal force or effect, do not set precedent and are not binding on taxpayers.